2 UNIVERSITY PLAZA, SUITE 402, HACKENSACK, NJ 07601 T. 201.265.6400 F. 201.265.0303 1441 Broadway, Suite 6022, New York, NY 10018 $\qquad \qquad T.212.354.0111$

February 7, 2020

VIA ECF

Honorable Pamela K. Chen United States District Judge United States District Court, Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Freeman, et al. v. HSBC Holdings plc, et al., 18-cv-7359 (PKC)(CLP) ("Freeman II") Bowman, et al. v. HSBC Holdings plc, et al., 19-cv-2146 (PKC)(CLP) ("Bowman")

Dear Judge Chen:

We write on Plaintiffs' behalf to advise the Court that Plaintiffs/Appellants' opening brief in *Freeman v. HSBC* ("*Freeman I*") is due on March 9, 2020.

We recognize that the Court may decide to proceed with the *Freeman II* and *Bowman* cases on a wholly separate track from the appeal of *Freeman I*. However, to the extent that the Court still agrees that the three cases should, in the interest of judicial efficiency, be consolidated on appeal, and intends to dismiss *Freeman II* and *Bowman* for the reasons stated in the Court's September 16, 2019 decision, ECF No. 237, and bench ruling on October 28, 2019 (or for additional or alternative reasons), the entry of judgment in *Freeman II* and *Bowman* would have to be effectuated shortly in order for the three appeals to be taken up together.

Should the Court require any additional information, we will be happy to provide it.

Respectfully submitted,
/s/ Gary M. Osen

cc: All counsel (by ECF)